

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA AND THE
STATES OF THE UNITED STATES, ex. rel.
Patrick Donohue,

Plaintiffs,

v.

RICHARD CARRANZA, et al.,

Defendants.

Civil Action No. 20-05396

**MOTION OF MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND
SECONDARY EDUCATION TO VACATE CLERK'S CERTIFICATE OF DEFAULT**

Pursuant to Fed. R. Civ. P. 55(c), defendant Massachusetts Department of Elementary and Secondary Education ("Massachusetts DOE") respectfully requests that the Court vacate the Clerk's Certificate of Default issued on November 2, 2022, *see* ECF No. 216, for good cause shown. The grounds for the motion are set forth in an accompanying Memorandum of Law.

Respectfully submitted,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Abigail Fee

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February 9, 2023

CERTIFICATE OF SERVICE

I hereby certify that I served the above Motion on all registered counsel on February 9, 2023, by filing the Motion through the Court's electronic filing system.

/s/ Abigail Fee
Abigail Fee
Assistant Attorney General